

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLORADO

Civil Action No. 18-cv-03112-RBJ-STV

SEAN SLATTON,

Plaintiff

v.

CITY OF FORT COLLINS, A MUNICIPALITY,

Defendant.

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**DEFENDANTS' UNOPPOSED MOTION FOR EXTENSION OF TIME  
TO RESPOND TO PLAINTIFF'S FIRST SET OF WRITTEN DISCOVERY**

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Defendant CITY OF FORT COLLINS, a municipality, by and through their attorneys, Mark S. Ratner of Hall & Evans, L.L.C, submits the following as Defendant's Unopposed Motion for Extension of Time to Respond to Plaintiff's First Set of Written Discovery:

**CERTIFICATE OF COMPLIANCE WITH D.C.COLO.LCivR 7.1(A)**

Pursuant to D.C.COLO.LCivR 7.1(A), the undersigned counsel conferred with counsel for Plaintiff. Counsel for Plaintiff does not oppose the relief sought in this Motion.

**I. ARGUMENT**

1. According to the allegations of Plaintiff's Complaint, this matter generally arises out of the arrest of Plaintiff, Sean Slatton, by police officers employed with the City of Fort Collins. Plaintiff alleges a violation of his Fourth Amendment rights, including the purported use of excessive force to effectuate his arrest.

2. On January 21, 2021, Plaintiff served his First Set of Written Discovery on the City of Fort Collins. Responses to the written discovery are due on or before February 22, 2021.

3. Undersigned Counsel is in the process of drafting appropriate responses, but requires additional time due to the breadth of the requested information.

4. Defendant is, therefore, requesting an additional 21-days which would make responses due on or before March 15, 2021.

5. Discovery in this matter concludes on August 10, 2021, and trial is set to begin on January 10, 2022 (ECF 122). A brief 21-day extension of time is not expected to interfere with these or any other dates provided in the scheduling order.

6. This is the first request for an extension of time made by Defendant and related to Plaintiff's First Set of Discovery.

WHEREFORE, Defendant respectfully requests the Court grant its Motion, and extend the time to submit responses to Plaintiff's First Set of Written Discovery, to March 15, 2021.

Dated this 18<sup>th</sup> day of February, 2021.

Respectfully submitted,

*s/ Mark S. Ratner*

Mark S. Ratner, Esq.

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**ATTORNEYS FOR DEFENDANT**

**CERTIFICATE OF SERVICE (CM/ECF)**

I HEREBY CERTIFY that on the 18<sup>th</sup> day of February, 2021, I electronically filed the foregoing **DEFENDANTS' UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO PLAINTIFF'S FIRST SET OF WRITTEN DISCOVERY** with the Clerk of Court using the CM/ECF system and mailed a copy to the following:

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ATTORNEYS FOR PLAINTIFF

*s/ Sarah Stefanick, Legal Assistant*  
**Hall & Evans, L.L.C.**